Message

From: Nwankwo, Adaobi [Nwankwo.Adaobi@epa.gov]
Sent: 5/28/2020 9:32:40 PM
To: Olszewski, Joshua [olszewski.joshua@epa.gov]
Subject: FW: NPS/Texas RH Source Selection Follow-up
Attachments: NPS-TX_RP_facilities-list_05-2020.xlsx

From: Feldman, Michael <Feldman.Michael@epa.gov>
Sent: Thursday, May 28, 2020 4:31 PM
To: Huser, Jennifer <Huser.Jennifer@epa.gov>; Medina, Dayana <Medina.Dayana@epa.gov>; Donaldson, Guy <Donaldson.Guy@epa.gov>; Nwankwo, Adaobi <Nwankwo.Adaobi@epa.gov>
Subject: FW: NPS/Texas RH Source Selection Follow-up

FYI – FLM input to TCEQ

From: Peters, Melanie <Melanie_Peters@nps.gov>
Sent: Thursday, May 28, 2020 3:41 PM
To: Feldman, Michael <Feldman.Michael@epa.gov>; Timin, Brian <Timin.Brian@epa.gov>
Cc: King, Kirsten L <kirsten_king@nps.gov>
Subject: Fw: NPS/Texas RH Source Selection Follow-up

FYI - follow up to our source selection meeting with Texas last week. I will also forward the note I sent Walker with our presentation.
Best,
Melanie

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Melanie V. Peters
NPS, Air Resources Division

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From: Peters, Melanie <Melanie_Peters@nps.gov>
Sent: Thursday, May 28, 2020 2:37 PM
To: Walker Williamson <walker.williamson@tceq.texas.gov>
Cc: King, Kirsten L <kirsten_king@nps.gov>; Margaret Earnest <margaret.earnest@tceq.texas.gov>
Subject: NPS/Texas RH Source Selection Follow-up

Hello Walker,
Thank you and your team for taking the time to meet with us last week to discuss the Texas approach to regional haze source selection for 4-factor analysis.

As we shared during the call, we are pleased that Texas has selected an individual pollutant-based Q/d threshold of 5 as screening criteria for 4-factor analysis consideration. This approach brings in a wider swath of appropriate sources for consideration than a combined pollutant approach and recognizes the efficacy of pollutant-specific controls.

We came away from the meeting with a better sense of the Texas process and some lingering questions about why 15 specific sources on our list (attached) were eliminated from consideration. We generally understand that these sources were left out either because of the sources' (a) projected 2028 emissions or (b) location with respect to area of influence. We asked that you share the data showing precisely why each of the sources on our list that you did not select for 4-factor analysis were eliminated.

Specifically, we want to know:

- What facilities were considered for potential 4-factor analyses?
- How were the 2028 "Q" values calculated for individual sources and what were they?
- How were the 2028 "Q/d" values calculated for individual sources? What distance "d" was used in each calculation and to what Class I area did that distance apply?
- What weighting factor was applied to the facilities for which Q/d was calculated? How was that weighting factor determined?
- What cutoff was used for determining the bounds of the area of influence?

We learned during the call that Texas used IMPROVE monitors to represent Class I areas in the area of influence analysis. In the future, we ask that you consider each individual Class I area on its own when evaluating which sources should be considered for further reasonable progress measures. While the Guadalupe Mountains NP monitor represents Carlsbad Caverns NP for glideslope calculation purposes, Carlsbad Caverns NP is an autonomous Class I area with its own geography that (at a minimum) should have been considered for the "d" portion of any Q/d analysis. Further, it is more appropriate to consider the distance from a source to the boundary of the Class I areas rather than the point location of the IMPROVE monitor. This makes a difference especially for larger parks like Big Bend NP. Modeling "receptor" files of points along the boundary are available for all Class I areas. Also, we understand that Bandelier National Monument (NM) in New Mexico was not considered as part of the Texas source selection process. Based on our simple Q/d analyses, emissions from at least three Texas sources have the potential to impair visibility at Bandelier NM. How did Texas arrive at the decision to exclude Bandelier NM from the analysis?

Finally, we asked you to consider area source emission reduction opportunities in the Permian Basin. Texas is among the states with the strongest engine rules for ozone non-attainment areas. Extending those requirements to the Permian basin would help reduce emissions that are negatively affecting visibility at Carlsbad Caverns and Guadalupe Mountains NPs. Back trajectory maps showing source areas for nitrate, elemental carbon, and sulfate at Carlsbad Caverns NP were included at the end of the presentation I forwarded last week. We have more initial data (manuscript in press) highlighting the influence of oil and gas emissions at Carlsbad Caverns NP that we would be happy to discuss further.

The NPS Air Resources Division very much appreciates the technical work you are undertaking to understand the future of emissions in the state and make reasonable progress on reducing haze causing emissions for our national parks. We also appreciate the time you have taken to engage with us during the regional haze SIP development process and look forward to continued conversations.

Best,

Melanie

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NPS, Air Resources Division

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